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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

*Representing the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

**3:25-cr-00017-ART-CSD**

Plaintiff,

CRIMINAL INDICTMENT

v.

VIOLATIONS:

ANTON ANDREYEVICH IAGOUNOV,

18 U.S.C. § 1038(a) – False Information and  
Hoax (Counts 1-15)

Defendant.

THE GRAND JURY CHARGES THAT:

COUNT ONE  
 False Information and Hoax  
 (18 U.S.C. § 1038(a))

On or about January 1, 2022, in the State and Federal District of Nevada,

ANTON ANDREYEVICH IAGOUNOV,

defendant herein, did knowingly engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably be believed, and where such information indicated that an activity had taken place that would constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly called the Saddleback Memorial Hospital, in Laguna Hills, California, with the

1 intent to convey false and misleading information, and said there was a bomb at the hospital  
2 and the “bomb was real this time;” such conduct would constitute a violation of Chapter 40  
3 of Title 18, United States Code, Section 844(e), all in violation of Title 18, United States  
4 Code, Section 1038(a).

5 COUNT TWO  
False Information and Hoax  
6 (18 U.S.C. § 1038(a))

7 On or about January 3, 2022, in the State and Federal District of Nevada,

8 ANTON ANDREYEVICH IAGOUNOV,

9 defendant herein, did knowingly engage in conduct with the intent to convey false and  
10 misleading information, under circumstances where such information may reasonably be  
11 believed, and where such information indicated that an activity had taken place that would  
12 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
13 called the Federal Bureau of Investigation, Resident Agency office, in Lewiston, Idaho, with  
14 the intent to convey false and misleading information and said, “You’re going to blow up  
15 today, there is a bomb under your building,” such conduct would constitute a violation of  
16 Chapter 40 of Title 18, United States Code, Section 844(e), all in violation of Title 18,  
17 United States Code, Section 1038(a).

18 COUNT THREE  
False Information and Hoax  
19 (18 U.S.C. § 1038(a))

20 On or about January 3, 2022, in the State and Federal District of Nevada,

21 ANTON ANDREYEVICH IAGOUNOV,

22 defendant herein, did knowingly engage in conduct with the intent to convey false and  
23 misleading information, under circumstances where such information may reasonably be  
24 believed, and where such information indicated that an activity had taken place that would

1 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
2 called United States Senator Cynthia Lummis's Washington, D.C. office with the intent to  
3 convey false and misleading information and said, "Somebody plans on blowing-up your  
4 office with an improvised explosives device. They're gonna try to do it this week. Yeah, you  
5 better get that investigated," such conduct would constitute a violation of Chapter 40 of  
6 Title 18, United States Code, Section 844(e), all in violation of Title 18, United States Code,  
7 Section 1038(a).

8 COUNT FOUR  
False Information and Hoax  
9 (18 U.S.C. § 1038(a))

10 On or about April 14, 2022, in the State and Federal District of Nevada,  
11 ANTON ANDREYEVICH IAGOUNOV,  
12 defendant herein, did knowingly engage in conduct with the intent to convey false and  
13 misleading information, under circumstances where such information may reasonably be  
14 believed, and where such information indicated that an activity had taken place that would  
15 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
16 called the North Las Vegas Police Department with the intent to convey false and  
17 misleading information and said, "There's a bomb at the Luxor that's gonna go off at noon.  
18 There's a bomb at the Luxor that's gonna go off at noon," such conduct would constitute a  
19 violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in violation of  
20 Title 18, United States Code, Section 1038(a).

21 COUNT FIVE  
False Information and Hoax  
22 (18 U.S.C. § 1038(a))

23 On or about April 14, 2022, in the State and Federal District of Nevada,  
24 ANTON ANDREYEVICH IAGOUNOV,

1 defendant herein, did knowingly engage in conduct with the intent to convey false and  
2 misleading information, under circumstances where such information may reasonably be  
3 believed, and where such information indicated that an activity had taken place that would  
4 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
5 called the Temple City Hall, in Temple City, Texas, with the intent to convey false and  
6 misleading information and said, "There's a bomb at Temple City Hall. It's gonna go off one  
7 hour from now. Very many people are gonna die. And we're gonna take the country back,"  
8 such conduct would constitute a violation of Chapter 40 of Title 18, United States Code,  
9 Section 844(e), all in violation of Title 18, United States Code, Section 1038(a).

10 COUNT SIX  
11 False Information and Hoax  
(18 U.S.C. § 1038(a))

12 On or about April 15, 2022, in the State and Federal District of Nevada,

13 ANTON ANDREYEVICH IAGOUNOV,

14 defendant herein, did knowingly engage in conduct with the intent to convey false and  
15 misleading information, under circumstances where such information may reasonably be  
16 believed, and where such information indicated that an activity had taken place that would  
17 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
18 called the Albany Fire Department in Albany, New York, with the intent to convey false  
19 and misleading information and said there was a thermal device in the Walmart Supercenter  
20 at 141 Washington Avenue Extension in Albany and that the device would detonate in one  
21 hour and America would pay, such conduct would constitute a violation of Chapter 40 of  
22 Title 18, United States Code, Section 844(e), all in violation of Title 18, United States Code,  
23 Section 1038(a).

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COUNT SEVEN  
False Information and Hoax  
(18 U.S.C. § 1038(a))

On or about April 15, 2022, in the State and Federal District of Nevada,

ANTON ANDREYEVICH IAGOUNOV,

defendant herein, did knowingly engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably be believed, and where such information indicated that an activity had taken place that would constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly called the Torrance, California Fire Department with the intent to convey false and misleading information and said, "There's a bomb set to go off at the Del Amo Fashion Center precisely one hour from now," and minutes later, called the Torrance, California Police Department, with the intent to convey false and misleading information and said, "There is a bomb at the Del Amo Fashion Center set to go off precisely one hour from now," such conduct would constitute a violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in violation of Title 18, United States Code, Section 1038(a).

COUNT EIGHT  
False Information and Hoax  
(18 U.S.C. § 1038(a))

On or about April 15, 2022, in the State and Federal District of Nevada,

ANTON ANDREYEVICH IAGOUNOV,

defendant herein, did knowingly engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably be believed, and where such information indicated that an activity had taken place that would constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly called the Saratoga State Park Police in Saratoga Springs, New York, using the phone

1 number for the Albany County Sheriff's Office Desk at the Albany International Airport, in  
2 Albany, New York, with the intent to convey false and misleading information and said  
3 there was a nuclear device that was set to detonate in one hour, such conduct would  
4 constitute a violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in  
5 violation of Title 18, United States Code, Section 1038(a).

6 COUNT NINE  
False Information and Hoax  
7 (18 U.S.C. § 1038(a))

8 On or about April 15, 2022, in the State and Federal District of Nevada,

9 ANTON ANDREYEVICH IAGOUNOV,  
10 defendant herein, did knowingly engage in conduct with the intent to convey false and  
11 misleading information, under circumstances where such information may reasonably be  
12 believed, and where such information indicated that an activity had taken place that would  
13 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
14 called the Boston Fire Department, with the intent to convey false and misleading  
15 information and said, "There's a bomb set to go off at the City Hall precisely one hour from  
16 now. You have been warned," and then minutes later called the Boston Fire Department  
17 Training Division and said, "we got alarms going off at City Hall. You guy's need to come  
18 here," such conduct would constitute a violation of Chapter 40 of Title 18, United States  
19 Code, Section 844(e), all in violation of Title 18, United States Code, Section 1038(a).,

20 COUNT TEN  
False Information and Hoax  
21 (18 U.S.C. § 1038(a))

22 On or about April 16, 2022, in the State and Federal District of Nevada,

23 ANTON ANDREYEVICH IAGOUNOV,  
24 defendant herein, did knowingly engage in conduct with the intent to convey false and

1 misleading information, under circumstances where such information may reasonably be  
2 believed, and where such information indicated that an activity had taken place that would  
3 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
4 called Harry Reid International Airport Control Center, Las Vegas, Nevada, with the intent  
5 to convey false and misleading information and said, "There's a thermo-nuclear explosives  
6 device set to go off at your airport precisely in an hour from now," such conduct would  
7 constitute a violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in  
8 violation of Title 18, United States Code, Section 1038(a).

9 COUNT ELEVEN  
10 False Information and Hoax  
(18 U.S.C. § 1038(a))

11 On or about April 16, 2022, in the State and Federal District of Nevada,

12 ANTON ANDREYEVICH IAGOUNOV,

13 defendant herein, did knowingly engage in conduct with the intent to convey false and  
14 misleading information, under circumstances where such information may reasonably be  
15 believed, and where such information indicated that an activity had taken place that would  
16 constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly  
17 called the California Highway Patrol Cadet Hiring and Recruitment Section, with the intent  
18 to convey false and misleading information and said, "Yeah we just got a report of a tactical  
19 nuclear device at the Oracle Arena set to go off an hour from now. Yeah you wanna call us  
20 back," and minutes later called California Highway Patrol Dispatch, Stockton, California  
21 and said, "a bomb was being transported up a California highway to the Oracle Arena in  
22 Oakland," such conduct would constitute a violation of Chapter 40 of Title 18, United  
23 States Code, Section 844(e), all in violation of Title 18, United States Code, Section 1038(a).

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COUNT TWELVE  
False Information and Hoax  
(18 U.S.C. § 1038(a))

On or about April 17, 2022, in the State and Federal District of Nevada,

ANTON ANDREYEVICH IAGOUNOV,

defendant herein, did knowingly engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably be believed, and where such information indicated that an activity had taken place that would constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly called the Port of San Francisco, California, with the intent to convey false and misleading information and said, "There will be a bomb explosion at Port of San Francisco today; you have been warned," such conduct would constitute a violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in violation of Title 18, United States Code, Section 1038(a).

COUNT THIRTEEN  
False Information and Hoax  
(18 U.S.C. § 1038(a))

On or about April 17, 2022, in the State and Federal District of Nevada,

ANTON ANDREYEVICH IAGOUNOV,

defendant herein, did knowingly engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably be believed, and where such information indicated that an activity had taken place that would constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly called the San Francisco International Airport Lost and Found, with the intent to convey false and misleading information and said, "There's a bomb scheduled to detonate in an hour at American Airlines in Terminal #1. You Americans have been notified," such



conduct would constitute a violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in violation of Title 18, United States Code, Section 1038(a).

COUNT FOURTEEN  
False Information and Hoax  
(18 U.S.C. § 1038(a))

On or about April 18, 2022, in the State and Federal District of Nevada,

ANTON ANDREYEVICH IAGOUNOV,

defendant herein, did knowingly engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably be believed, and where such information indicated that an activity had taken place that would constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly called the Solano County Sheriff's Office, in Vallejo, California, with the intent to convey false and misleading information and said, "Y'all going to be picking up body parts once the bomb I planted at city hall goes off. Just remember, death doesn't discriminate," such conduct would constitute a violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in violation of Title 18, United States Code, Section 1038(a).

COUNT FIFTEEN  
False Information and Hoax  
(18 U.S.C. § 1038(a))

On or about April 19, 2022, in the State and Federal District of Nevada,

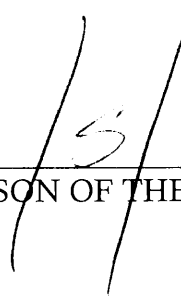
ANTON ANDREYEVICH IAGOUNOV,

defendant herein, did knowingly engage in conduct with the intent to convey false and misleading information, under circumstances where such information may reasonably be believed, and where such information indicated that an activity had taken place that would constitute a violation of Chapter 40 of United States Code. To wit: the defendant knowingly called the Sacramento County Sheriff's Office in Sacramento, California, with the intent to

1 convey false and misleading information and said, "A tactical thermo-nuclear bomb is set to  
2 detonate in precisely one hour at the Sacramento International Airport. Very many people  
3 are going to die. America, you have been warned," such conduct would constitute a  
4 violation of Chapter 40 of Title 18, United States Code, Section 844(e), all in violation of  
5 Title 18, United States Code, Section 1038(a).

6 **DATED:** this 8 day of May 2025.

7 **A TRUE BILL:**

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FOREPERSON OF THE GRAND JURY

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SIGNAL CHATTAH  
United States Attorney

  
RANDOLPH J. ST. CLAIR  
Assistant United States Attorney